

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

MARK WATSON,

Plaintiff,

v.

DAVID R. GRIMMETT,

Defendant.

Case No. 3:22-cv-00601

Chief Judge Waverly D. Crenshaw, Jr.
Magistrate Judge Alistair E. Newbern

**THIRD JOINT MOTION FOR EXTENSION OF DEADLINE
TO FILE DISMISSAL PAPERS**

Plaintiff Mark Watson (“Plaintiff”), and Defendant David R. Grimmett (“Defendant”), by and through their undersigned counsel, for their Third Joint Motion for Extension of Deadline to File Dismissal Papers, state as follows:

1. On October 13, 2023, the Parties filed a Notice of Settlement and Motion to Stay (ECF No. 30), informing the Court that they had reached a settlement in principle and requesting that the Court stay all remaining deadlines to allow the Parties time to finalize the settlement terms and dismiss the case.

2. The Parties informed the Court that they anticipated filing their dismissal papers by November 13, 2023. *Id.*

3. On October 16, 2023, the Court granted the Parties’ Motion to Stay and ordered the Parties to file their dismissal papers by November 13, 2023. ECF No. 31.

4. On November 13, 2023, the Parties filed a Joint Motion for Extension of Deadline to File Dismissal Papers, informing the Court that they were still in the process of finalizing settlement terms and in the process of drafting the agreement to the satisfaction of all parties. ECF

No. 33. The Parties requested that the deadline to file their dismissal papers be extended until January 12, 2024. *Id.*

5. On November 14, 2023, the Court granted the Parties' Joint Motion for Extension of Deadline to File Dismissal Papers and ordered the Parties to file their dismissal papers by January 12, 2024. ECF No. 34.

6. On January 12, 2024, the Parties filed a Second Joint Motion for Extension of Deadline to File Dismissal Papers, requesting that the deadline be extended until February 12, 2024. ECF No. 35.

7. On January 17, 2024, the Court granted the Parties' Second Joint Motion for Extension of Deadline to File Dismissal Papers and ordered the Parties to file their dismissal papers by February 12, 2024. ECF No. 36.

8. The Parties have made progress in finalizing the settlement agreement, but still need additional time not only to finalize the agreement, but also to perform as contemplated under the settlement agreement before filing their dismissal papers.

9. The Parties respectfully request that the deadline to file their dismissal papers be extended until April 12, 2024.

10. This motion is not brought for the purpose of delay, and the requested extension will not prejudice any party.

WHEREFORE, the Parties jointly request that the deadline to file their dismissal papers be extended until April 12, 2024; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

s/ Colby Qualls

Colby Qualls
Ark. Bar No. 2019246
FORESTER HAYNIE PLLC
400 North Saint Paul Street, Ste. 700
Dallas, Texas 75201
Telephone: (214) 210-2100
cqualls@foresterhaynie.com

Heather M. Collins, BPR #26099
Ashley Shoemaker Walter, BPR #037651
HMC Civil Rights Law, PLLC
7000 Executive Center Drive
Building Two, Suite 320
Brentwood, TN 37027
615-724-1996
615-691-7019 FAX
heather@hmccivilrights.com
ashley@hmccivilrights.com

Attorneys for Plaintiff

s/ Mary Taylor Gallagher

Mary Taylor Gallagher, BPR #21482
GULLETT SANFORD ROBINSON &
MARTIN PLLC
150 Third Avenue South, Suite 1700
Nashville, Tennessee 37201
Telephone: (615) 244-4994
Facsimile: (615) 256-6339
mtgallagher@gsrm.com

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of February, 2024, a copy of the foregoing **Third Joint Motion for Extension of Deadline to File Dismissal Papers** was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

Mary Taylor Gallagher, Esq.
GULLETT SANFORD ROBINSON & MARTIN PLLC
150 Third Avenue South, Suite 1700
Nashville, Tennessee 37201
Telephone: (615) 244-4994
Facsimile: (615) 256-6339
mtgallagher@gsrm.com

Attorney for Defendant

s/ Colby Qualls

Colby Qualls